

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

VIDYA JAGANNATHAN,)	
)	
Petitioner,)	
)	Civil Action
v.)	No. 04CV11316-PBS
)	
SANDRA T. BUSHEY, Acting Center)	
Director of the Vermont Service Center)	
of the Bureau of Citizenship and)	
Immigration Services, and)	
THE UNITED STATES DEPARTMENT)	
OF HOMELAND SECURITY, BUREAU)	
OF CITIZENSHIP AND IMMIGRATION)	
SERVICES,)	
)	
Respondents.)	

**RESPONDENTS' ASSENTED TO MOTION FOR A THIRTY DAY EXTENSION UNTIL
SEPTEMBER 15, 2004 TO ANSWER OR OTHERWISE RESPOND TO THE
COMPLAINT**

Respondents hereby move for an extension until September 15, 2004, to answer or otherwise respond to the instant Complaint.

The instant Mandamus Complaint seeks to compel the Bureau of Citizenship and Immigration Services to adjudicate the Plaintiff's petition seeking adjustment of status. On June 17, 2004, the United States Attorney's Office was provided with a copy of the Petition.

Counsel for the Respondents believes this to be an action that may resolved without further action by this court, and alternatively, should no agreement be reached, that the matter may be resolved by way of a dispositive motions. The extension requested is reasonably necessary to investigate the possibility of resolution and to prepare any necessary responsive pleading.

Counsel for the Plaintiff has assented to a thirty day extension.

Wherefore, the Respondents request that this Court allow an extension, until September 15, 2004, to answer or otherwise respond to the Petition.

Respectfully submitted,

MICHAEL SULLIVAN
United States Attorney

By: /s/ Mark J. Grady
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CERTIFICATE UNDER L.R. 7.1

Counsel have conferred and the Plaintiff has, through counsel, assented to the motion.

/s/ Mark J. Grady
Mark J. Grady
Assistant United States Attorney

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that on this 16th day of August 2004, service of the foregoing Motion has been made upon counsel for the Petitioner, Richard M. Green, 57 East Main Street, Suite 211, Westborough, MA 01581, by depositing a copy in the United States mail, postage prepaid.

/s/ Mark J. Grady
Mark J. Grady
Assistant United States Attorney